

Texas Department of Health

Health Insurance Portability and Accountability Act (HIPAA) Project

Project Management Plan

Version 1.0

July 30, 2001



Approvals Signature Block

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PREFACE

This Project Management Plan (PMP) is the controlling document for the managing of the Texas Department of Health (TDH), Health Insurance Portability and Accountability Act (HIPAA) Project by TDH Enterprise Systems. The PMP provides all stakeholders with information regarding the standards and controls implemented by the HIPAA Enterprise PMO to control and monitor the multiple TDH programs that are impacted by the implementation of HIPAA standards.

1. OVERVIEW OF THE HIPAA PROJECT

The Health Insurance Portability and Accountability Act of 1996, Public Law 104-191 (HIPAA), was enacted by Congress to reform the healthcare insurance market and simplify health care administrative processes. The Administrative Simplification provisions of HIPAA, designed to improve the efficiency and effectiveness of the healthcare system and protect electronic health information, mandates the implementation of administrative and technical rules (standards) in five specific areas. Within each area there are legal, regulatory, process, security and technology aspects that must be carefully evaluated prior to implementation. The five areas are as follows:

- electronic transaction standards,
- standard transaction code sets for information,
- unique health identifiers for employers and providers,
- security and digital signatures, and
- privacy of individually identifiable health information.

The standards apply to organizations that process health care related information electronically including health plans, health care providers, clearinghouses, employers and other entities exchanging or maintaining health information electronically.

The Electronic Data Interchange (EDI) standard transaction code sets are defined in a series of Implementation Guides that provide standardized data requirements and data content specifications. The transaction sets that are applicable to Medicaid include:

- Eligibility inquiry and response (ASC X12N transaction set numbers 270/271)
- Claim status inquiry and response (276/277)
- Authorization request and response (278)
- Health insurance premium payment (820)
- Beneficiary enrollment (834)
- Remittance and payment (835)
- Claim and encounter (837)
- Claim attachment (275)

In order to become HIPAA compliant, Texas will identify which Medicaid and non-Medicaid systems interfaces or business processes are impacted by HIPAA, determine what changes

need to be made to bring the systems into compliance with the HIPAA standards, make the changes, and finally implement the changes.

1.1 PURPOSE, SCOPE, AND OBJECTIVES

PURPOSE

The purpose of the TDH HIPAA Project is:

- to provide oversight and coordination of effort for all TDH programs that are impacted by HIPAA as they move to HIPAA compliance.

SCOPE

The TDH HIPAA Project will use of standardized project management practices based on the Project Management Institute's, Body of Knowledge (PMBOK) and IEEE Standards for Software Development. The HIPAA project has three phases: Assessment and Analysis, Remediation, and Implementation. This document will focus primarily on the Assessment Phase, and be updated to address the second and third phases in more detail once this Phase has been completed.

OBJECTIVES

Objectives of the HIPAA Project include:

- Ensure that the TDH HIPAA Project will follow the established standards.
- Ensure that a detailed Work Breakdown Structure including all tasks for all projects will be developed and maintained.
- Monitor and coordinate efforts toward compliance by TDH programs impacted by HIPAA
- Ensure that all HIPAA impacted TDH programs interpret and implement the HIPAA regulations in a consistent manner.
- Coordinate the Implementation Schedule for all HIPAA impacted TDH programs.

1.2 ASSUMPTIONS AND CONSTRAINTS

Assumptions and Constraints	Impact to Plan if not True
HIPAA implementation is currently mandated for 2002.	If the implementation date remains 2002, project should proceed on schedule.

Assumptions and Constraints	Impact to Plan if not True
The HHSC APD will be approved.	If 100% approval not achieved, the HIPAA project would have funding limitations.
The project is constrained by the X12N standards.	If Texas is unsuccessful in changing any standards, it potentially will add cost.
Adequate TDH staff and program subject matter experts (SME's) will be available to complete the work.	If inadequate agency resources and/or SME's are unavailable it will add time to the schedule and may delay HIPAA compliance.

Table 1. Assumptions and Constraints

1.3 PROJECT DELIVERABLES

Deliverables	Date Available
TDH HIPAA Web Site	Ongoing
Transaction Crosswalks – High Level	Ongoing
Transaction Crosswalks – Detailed	Ongoing
TDH HIPAA Project Charter	May 2001 - Completed
TDH HIPAA Survey Assessment Tool (Questionnaire)	June 2001 - Completed
TDH HIPAA Project Management Plan (PMP)	July 2001
TDH HIPAA Communication Plan	July 2001 - Completed
TDH HIPAA Cost Accounting and Tracking Plan (CATP)	July 2001 - Completed
TDH HIPAA Work Breakdown Structure (WBS)	August 2001
TDH HIPAA Risk Analysis	September 2001
TDH HIPAA Survey Analysis	September 2001
TDH HIPAA Project Development Plan (PDP)	October 2001
TDH HIPAA Issue Tracking Log	October 2001
TDH HIPAA Quality Assurance Plan	October 2001
TDH Gap Analysis	October 2001

Table 2. Key Project Deliverables

1.4 HIPAA FUNDING SUMMARY

The Texas State Legislature provided no line item funding to achieve HIPAA compliance. Instead, they included a HIPAA Rider, Section 10.11 in the General Appropriations Act. This rider mandates that a plan must be submitted to Governor, the Lieutenant Governor, Member of the Texas Senate, Members of the House of Representatives and the Legislative Budget Board no later than September 1, 2002 to address the analysis of HIPAA financial impact on the state agency as well as the state's overall progress in implementing HIPAA.

Currently, TDH has no legislated appropriations, no capital authority and no established budget for implementing HIPAA. Additionally, HIPAA is viewed as a Project Over Threshold (POT) i.e. will exceed \$1million in costs. HIPAA will be addressed in the next version of the TDH Biennial Operating Plan (BOP).

HIPAA is a federal mandate and TDH must achieve HIPAA compliance. Despite the absence of funding for HIPAA project management and assessments, TDH has already begun to assess HIPAA impact, to determine an appropriate course of action and to estimate costs by the September 1, 2002, the Texas legislated mandated deadline. Refer to the TDH HIPAA Cost Accounting and Tracking Plan, approved July 27, 2001 for detailed plan.

1.5 EVOLUTION OF THE PLAN

The first draft of this Plan will be completed in July. The Plan will be disseminated to TDH Management and HHSC Management for review and comment. Once changes are incorporated, the PMP will be published on the TDH HIPAA website. A new version of the PMP will be created at the beginning of each new project Phase.

2. REFERENCES

- HHSC Planning APD and related correspondence, May 2001, HHSC HIPAA website
- TDH HIPAA Project Charter, HHSC HIPAA Interagency Workgroups, TDH and HHSC HIPAA website
- Project Management Institute (PMI) Standards Committee Project Management Body of Knowledge Guide (PMBOK), 1996 edition
- HIPAA project Federal HCFA website: <http://www.hcfa.gov/medicaid/hipaa>, publishes HIPAA rules, regulations, and standards. Other national workgroups (for example the WEDI, NMEH, NUBC, and NUCC) are currently working on HIPAA issues and publish information about their work and the HCFA website provides links to related websites such as the WEDI and NMEH workgroup sites. Also found on this website is the Medicaid HIPAA-Compliant Concept Model (MHCCM).
- National Electronic Data Interchange Transaction Set Implementation Guides published by ASC X12N and available at the following website:
<http://www.hhsc.state.tx.us/MHCCM/default.htm>

3. DEFINITIONS AND ACRONYMS

Term	Definition
Operating Agency	Texas Department of Health
X12N	Refers to the transaction standards published by the members of the ASC X12N standards board.
Covered Transaction	An electronic healthcare transaction that goes between two HIPAA covered entities. Transactions that are internal to

Term	Definition
	an entity are not typically covered.
Transaction Set Implementation Guide	Provides standardized data requirements and content about each of the covered transaction sets. The Guides are published by the National Electronic Data Interchange ASC X12N Standards Committee and can be downloaded from the internet for free (see site address above in Section 2).
HIPAA Oversight Contractor	Obtained through the HHSC RFP process, this contractor will provide oversight services for the Assessment Phase

Acronym	Meaning
HIPAA	Health Insurance Portability and Accountability Act
HHSC	Health and Human Services Commission
TDH	Texas Department of Health
PMO	Project Management Office in TDH Enterprise Systems
PMP	Project Management Plan
WBS	Work Breakdown Structure
HCFA	Health Care Financing Administration
APD	Advanced Planning Document
PAPD	Planning Advanced Planning Document
HHSC	Health and Human Services Commission
NDIS	National Data Interchange Standards
DSMO	Designated Standard Maintenance Organization
RFP	Request for Proposal
NHIC	National Health Insurance Co.
SME	Subject Matter Expert
EDI	Electronic Data Interchange

Table 3. Definitions and Acronyms

4. PROJECT ORGANIZATION

TDH created the HIPAA PMO to oversee and coordinate the efforts of the TDH programs in achieving HIPAA compliance. Dr Charles Bell, TDH Executive Deputy Commissioner, appointed Ben Delgado, Deputy Commissioner for Operations, and Tom Thornton, Associate Commissioner for Information Systems (IS) as Executive Sponsors for the HIPAA project. The sponsors assigned Information Systems; Enterprise Systems responsibility for project management of the HIPAA project on behalf of the entire has appointed an Agency Project Director who is responsible for TDH HIPAA project management.

4.1 INTERNAL STRUCTURE

HIPAA Project Organization Chart

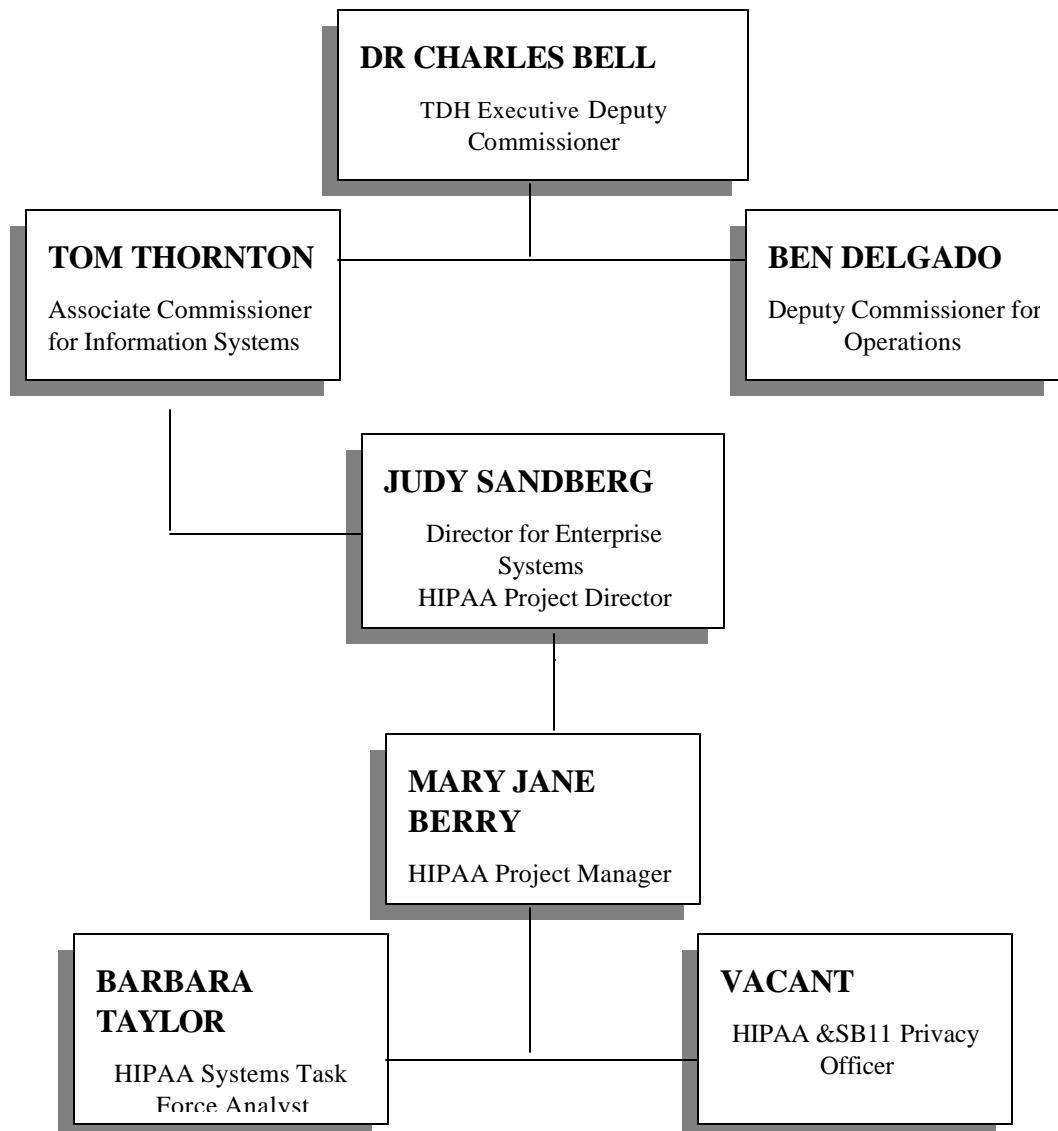


Figure 1. Organization Chart

4.2 ROLES AND RESPONSIBILITIES

Role	Person Assigned	Responsibilities
TDH Enterprise HIPAA Project Management Office Director	Judy Sandberg	<ul style="list-style-type: none"> Prepares executive summaries or briefings Provides project management direction, oversight and quality control Provides budget oversight Is accountable to TDH executive sponsors Reports to HHSC HIPAA PMO
TDH HIPAA Project Manager	Mary Jane Berry	<ul style="list-style-type: none"> Identify subject matter experts (SMEs) per TDH HIPAA impacted program Ensures project schedules are met Is accountable to TDH project director Manages project issues/risks/change control Coordinates with TDH programs to ensure compliance and accurate accounting Coordinate data collection Prepares cost accounting reports
TDH Workgroup Members	Transaction Set Workgroup Members:	<ul style="list-style-type: none"> Develop and achieve consensus on entity definition document Develop high level data crosswalk depending on the transaction set identified
Information Resource Steering Committee (IRSC)		<ul style="list-style-type: none"> Provides overall guidance Resolves cross-project issues Monitors time commitment and priority Evaluates risk
TDH Program Subject Matter Experts		
TDH Program IT Technical Analysts		

Table 5. Project Roles and Responsibilities

5. MANAGERIAL PROCESS PLANS

The project will be closely monitored to ensure that timeframes are established and met and that the quality of the project is assured. The following steps will be taken to monitor and coordinate the progress of the project:

- The TDH Project Manager will provide bi-weekly status reports to the HHSC PMO and TDH HIPAA Project Director
- TDH deliverables will be reviewed and approved by the HIPAA Project Manager and Project Director
- The TDH HIPAA Project Manager and Director will address issues, monitor schedules, and present issues to the IDH Information Resource Executive Steering Committee and HHSC when necessary.

5.1 START-UP PLAN

5.1.1 Estimation Plan

The project scope and schedule is dependent upon final Federal law and promulgation of Federal regulation by HCFA. The project budget and schedule will be based upon work and due dates required by the current legislation and amended only if pending legislation is passed. A preliminary estimate of project effort and budget has been done using best guest estimates from agency subject matter experts and will be updated as the Assessment Phase progresses. Costing will be done using a bottom up approach. TDH will track HIPAA costs separately and report costs to HCFA using the HCFA-64, as required by Federal regulation.

The purpose of the Assessment is to identify automated systems and business processes that must change in order to be HIPAA compliant. A survey has been developed that will help staff assess impact of HIPAA, if any, and this survey will be given to program area staff to complete. Systems and processes will be identified through this survey and an impact analysis will be conducted to prioritize and quantify the changes that must be made.

5.1.2 Staffing Plan

TDH Project Manager will request project SME resources from their respective TDH HIPAA impacted program. Staff with knowledge of their respective programs and systems will be needed. In addition to TDH in-house staff, additional contract personnel may be retained. External contractors, who provide certain skill-sets and/or expertise that may not be available internally for this project, will supplement knowledgeable in-house staff, if needed and approved by HIPAA Project Director.

5.1.3 Staff Training Plan

TDH program subject matter experts will need an introduction to HIPAA and some training on the X12N standards. The Enterprise Systems, HIPAA Project Manager will develop a HIPAA overview presentation that can be used to introduce staff to HIPAA and its requirements. The

Project Manager will also develop a short training session that will introduce staff to the X12N standards and help them understand how to use the Transaction Set Implementation Guide. The Project Manager on an as-needed basis will provide the training to the workgroups.

5.2 WORK PLAN

During the Assessment Phase, the following tasks will be completed:

- Survey systems, interfaces, and business processes to identify those that must change in order to be HIPAA compliant;
- Develop an inventory and functional description of each HIPAA impacted system, interface or process;
- Develop a high-level crosswalk between the current data elements and the X12N data elements;
- Identify, describe and estimate the amount of work involved in making the identified changes;
- Identify options for changes including a plan, schedule and cost estimate for each of the alternatives;
- Recommend alternatives and obtain HHSC HIPAA PMO and TDH Information Resources Executive Steering Committee approval;
- Prioritize the changes.

The Work Plan is managed and monitored through a Work Breakdown Structure (WBS) in Microsoft Project 2000. The WBS will be updated weekly and monitored daily for work activity status and tasking. The project will progress in three phases: Assessment, Remediation and Testing. This PMP addresses the Assessment Phase and new PMP versions will be created as we move from one phase to another.

5.2.1 Work Activities

Work Activities	Due Date	Status
Establish TDH Project Office	03-01-2001	Completed
HIPAA Project Charter	04-12-2001	Completed
Prepare High Level Cost Estimate for HHSC	04-20-2001	Completed
Attend HCFA National HIPAA Conference	04-27-2001	Completed
Identify TDH Liaisons	05-09-2001	Completed

HIPAA Kick-Off Meeting	05-10-2001	Completed 5-21-01
HIPAA Update Meetings/Presentations for TDH	Fall 2001	In development
Work Breakdown Structure/Initial Timeline	05-20-2001	In progress
TDH Communication Plan	07-31-01	Completed 7-20-01
HIPAA Cost Accounting and Tracking Plan	08-01-01	In progress
HIPAA Project Management Plan (PMP)	07-30-01	In progress
HIPAA Project Development Plan (PDP)	08-31-01	In progress
HIPAA Risk Management Plan	08-17-01	In progress
HIPAA Web Site.	05-30-2001	Launched - Status is updated monthly
HIPAA survey to identify covered entities and submit to HHSC. (220 offices/departments/programs surveyed within TDH)	08-01-01	Survey released on 6-04-01 Currently, 95% response received
Analyze Surveys to begin assessing impacts.	08-15-01	In progress
Hire a Privacy Officer	09-01-01	In progress
Identify Single Points of Contact/Subject Matter experts on policy and IT for affected programs.	08-31-01	
HIPAA “834” Enrollment Workgroup.	Established: 04-19-01	In progress
HIPAA “820” Health Insurance Premium Payment Workgroup.	Established: 06-13-2001	In progress
Meet with Program Management, SPOCs, SMEs for affected programs to help them launch their business/systems assessments.	TBD	
Develop Impact Assessment Paper	01-01-2002	
Develop Remediation Plan	TBD	
Develop Business Process Improvement Plan	TBD	

Purchase Hardware if required for Security	TBD	
Develop/remediate software	TBD	
Test & Validate software	TBD	
Prepare technical & end user documentation	TBD	
Train technical staff & end users	TBD	
Implement Transaction Codes	10-16-2002	
Implement Privacy Rules	04-14-2003	

Table 6. Work Activities

5.3 CONTROL PLAN

5.3.1 Requirements Management

Based on the information gathered and documented in the Assessment Phase, TDH Project Manager will develop and obtain agreement on final requirements. A change to the requirements will be handled through the Change Request process. The person or entity requesting the change will complete a Change Request and the Enterprise System, HIPAA PMO for possible inclusion, will review the Request. The Project Manager will analyze requests for impact to project schedule, estimation (hours/budget), resources and other risk factors. Determination of impact will be based on the requested change, historical data and effect on current project. Change requests with a negative impact to any of the above-mentioned factors will be taken to the TDH Information Resources Executive Steering Committee.

5.3.2 Schedule Control

The schedule will be monitored using the WBS and the activity list. Using Microsoft Project 2000, milestones and activities will be identified and monitored for completion. The project baseline will be compared with actual work activity. Variations plus/minus 10% of baseline will be identified as issues or risks with corrective action plans.

5.3.3 Budget Control

Once firmly established, the project budget will be evaluated weekly and compared with work activity completion.

5.3.4 Quality Control

The TDH Enterprise Systems HIPAA PMO will perform internal verification and validation of work products by reviewing scope, business rules, software requirements and the testing results.

The HHSC HIPAA Oversight Contractor, if hired, will develop and maintain the Quality Assurance Plan. This Plan will describe the mechanisms that will be used to measure and control the quality of the work processes and resulting work products. If there is not an oversight contractor, the Enterprise Systems PMO will be responsible for quality control.

5.3.5 Reporting and Communication Plan

A separate TDH Communication Plan has been developed, approved and is available on the TDH HIPAA Project website.

5.3.6 Measurement Plan

The transaction sets that are determined to be covered under the HIPAA for any TDH HIPAA impacted program must be HIPAA compliant by the date mandated by HCFA. Ultimately, Federal auditors will measure HIPAA compliance. The baseline values for this project are the X12N transaction standards. In each phase of the project, each covered transaction will be measured against the transaction standards to ensure that compliance is achieved.

5.4 RISK MANAGEMENT PLAN

The TDH HIPAA PMO, in conjunction with HHSC and Interagency Project Managers, will identify, analyze and prioritize risks associated with the HIPAA project. A corresponding proposed action (mitigation) plan would be developed for identified risks. The TDH HIPAA PMO will distribute risks for review in order to identify new risks and changes to current risks. A TDH risk management plan will be created and modified as needed.

5.5 CLOSEOUT PLAN

The work activity and resource management is monitored and controlled through the WBS. As tasks are completed and/or resources released, the WBS will be updated for project completion. Staff will be released for other tasking as deliverables are completed.

As each Phase of the project is completed, a post project-phase review will be scheduled with the project team and other appropriate staff to discuss and document lessons learned.

6. TECHNICAL PROCESS PLANS

The primary technical focus of this project is to adapt the current IT systems to interface to the HIPAA compliant standards.

6.1 PROCESS MODEL

HCFA developed the Medicaid HIPAA-Compliant Concept Model (MHCCM) as a tool to help states analyze the impact of HIPAA and select the best implementation strategies. The MHCCM provides guidelines for activities, milestones, major deliverables for the HIPAA project. (A full description of the MHCCM is located at:

<http://www.hcfa.gov/medicaid/hipaa/adminsim/mcdhipp2.pdf>

The HHSC PMO will take advantage of the MHCCM guidelines whenever possible and TDH will take advantage when appropriate.

6.2 METHODS, TOOLS, AND TECHNIQUES

Items from the HCFA MHCCM toolkit will be used whenever possible. These include, but are not limited to, the General Implementation Plan, the Checklists, the Crosswalks, and the X12N Data Element Dictionary.

The X12N Transaction Set Implementation Guides will be used to provide the transaction specifications.

TDH HIPAA Project Manager will follow the guidelines published by the Project Management Institute and IEEE Std 1058-1998. The software tools used to monitor the project are Microsoft Word, Excel and Project 2000. Documents will be published in the HIPAA Project web site.

Information from other states provides important tools for validating all aspects of the Texas HIPAA project. Other states documentation and work products can be used to avoid “reinventing the wheel” and can offer an important source for corroborating project approach.

6.3 INFRASTRUCTURE PLAN

Project deliverables and documentation will be shared on the HHSC HIPAA and TDH project website. The X12N Transaction Set Implementation Guides and the HCFA MHCCM are available on the HCFA website.

6.4 ACCEPTANCE PLAN

TDH staff will develop separate Test and Acceptance Plan documents for each of the impacted systems/programs identified in the Assessment Phase. These documents will also describe the software deployment plan.

7. SUPPORTING PROCESS PLANS

7.1 PRODUCT TESTING AND REVIEWS PLAN

Agency staff will develop separate Test and Acceptance Plan documents for each of the impacted systems identified in the Assessment Phase. These documents will also describe the software deployment plan.

7.2 QUALITY ASSURANCE PLAN

The HHSC HIPAA Oversight Contractor will develop and monitor the Quality Assurance Plan, if approved and hired. The Request for Proposal (RFP) for the Oversight Contractor document will provide a description of the requirements for this Plan.

7.3 PROJECT REVIEWS

At the conclusion of the Assessment Phase, a walk-through of the Assessment and Gap Analysis document will be held with appropriate TDH HIPAA impacted programs. The purpose of the walk-through will be to:

- 1) Verify high-level requirements
- 2) Ensure that all systems, interfaces and business processes have been identified
- 3) Validate the process
- 4) Make recommendations for improvement.

7.4 ISSUE MANAGEMENT

For purposes of this project, an issue refers to any matter that may impede the project progress, about which no agreement has been reached. The TDH Project Manager is expected to bring issues forward for resolution. The HHSC PMO Director will own the central issue log and will assign responsibility for the resolution of the issue to the appropriate group, and monitor resolution progress. Issue management can be initiated when:

- Additional fact-finding efforts are required to determine the correct course of action
- There is a lack of consensus on a correct course of action
- The issue matter is blocking progress in other areas and it is better to remove the discussion from the current arena
- Disagreement exists as to whether something is in or out of the project scope.

7.5 SUBCONTRACT AND ACQUISITION MANAGEMENT PLAN

In addition to TDH SMEs, additional contract personnel may be retained. External contractors, who provide certain skill-sets and/or expertise that may not be available internally for this project, will supplement knowledgeable in-house staff, if approved and budgeted.

The Request for Proposal (RFP) process will be used to acquire a professional HHSC HIPAA consultant team to provide HHSC HIPAA oversight services. This Oversight Contractor will assist the state in performing the Assessment Phase, including assisting with requirements assessment analysis, gap analysis, implementation planning, and quality assurance planning and control. A separate RFP document for HHSC HIPAA PMO will be developed and will fully outline the scope of work for this resource.

7.6 PROCESS IMPROVEMENT PLAN

Processes used on this project are in a continuous state of development and review. TDH HIPAA Project Manager is responsible for facilitating review and improvement of the project management processes.

During the Assessment Phase, business processes may be determined to be non-HIPAA compliant (or result in data that is non-compliant). TDH HIPAA Project Manager is responsible for the remediation of these business processes.

DOCUMENT CONTROL

CHANGE HISTORY

Revisi on	Release Date	Description [list of changed pages and reason for change]

DOCUMENT STORAGE

This document was created using Microsoft Word. The file is stored on the

DOCUMENT OWNER

Mary Jane Berry, TDH HIPAA Project Manager is responsible for developing and maintaining this document.